

**THE MARGOLIS LAW FIRM LLC**

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**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ALLY FINANCIAL INC.  
and ALLY BANK,  
  
Plaintiffs,

v.

LEE DODGE, INC.  
and ROBERT A. LEE, JR.,  
  
Defendants.

DOCKET NO.: 10-CV-4702 (NG)

Civil Action

NOTICE OF CROSS-MOTION FOR  
EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS' POST-JUDGMENT  
DISCOVERY DEMANDS ON SHORT  
NOTICE

**NOTICE OF CROSS-MOTION BY DEFENDANTS FOR AN EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' POST-JUDGMENT DISCOVERY DEMANDS ON SHORT  
NOTICE**

To: Robert J. Brener, Esq.  
Edwards, Angell, Palmer & Dodge LLP  
750 Lexington Avenue  
New York, New York 10022  
Attorneys for Plaintiffs Ally Financial Inc. and Ally Bank

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Robert A. Lee, Jr. and the exhibits thereto, and the accompanying Memorandum of Law in support of Defendants' Cross-Motion for an Extension of Time to Respond to Plaintiffs', Ally Financial, Inc. and Ally Bank (collectively referred to hereinafter as "Ally") Post-Judgment Discovery, and in opposition to Plaintiffs' Motion for Contempt and to Compel Defendants to Respond to Post-Judgment Discovery Demands and to Appear for a Deposition, by their attorneys, The Margolis Law Firm LLC, shall move this Court before

The Honorable Marilyn D. Go, U.S.M.J on June 27, 2011, or as soon thereafter as the Court permits, for an Order granting Defendants an extension of time to respond to Plaintiff's post-judgment discovery; ordering that any deposition of Robert A. Lee, Jr. shall be postponed until such time that he is not at risk of physical injury by participating in same; and denying Plaintiff's Motion for contempt and to compel Defendants to respond to post-judgment discovery demands and to appear for a deposition in its entirety.

PLEASE TAKE FURTHER NOTICE that Defendants hereby request oral argument.

Respectfully Submitted,

**THE MARGOLIS LAW FIRM LLC**  
Attorneys for Defendants

By: /s/ Seth L. Dobbs  
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Dated: June 21, 2011